

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

DAPHNIE MONGERARD

Debtor

Chapter 13

Bankruptcy No.24-12705-PMM

OBJECTION OF CHAPTER 13 TRUSTEE  
TO CONFIRMATION OF PLAN OF DEBTOR

**AND NOW** comes Kenneth E. West, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtor, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtor has failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtor to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan has not been proposed in good faith as required by 11 U.S.C. Section 1325 (a) (3).

Debtor(s) has/have failed to file an amended plan as directed at the meeting of creditors.

Debtor(s) has/have failed to file amended schedules as directed at the meeting of creditors.

**WHEREFORE**, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Kenneth E. West

Kenneth E. West, Esquire  
Chapter 13 Standing Trustee